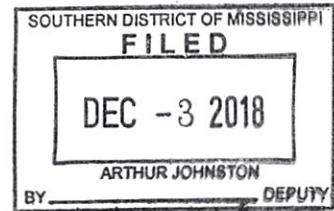


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15cv382HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A TROUT
POINT LODGE LTD OFNOVA SCOTIA
& IN THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, TORSTAR
CORPORATION, NATIONAL
GEOGRAPHIC SOCIETY, XYZ
FOUNDATION & JOHN DOES 1-50

DEFENDANTS

DEFENDANT CHARLES LEARY'S
PRO SE MOTION UNDER FED.R.CIV.P. 11, 5, AND
THE COURT'S INHERENT AUTHORITY

COMES NOW Plaintiff by counterclaim **Charles Leary**, appearing *pro se*, and files this his Motion respectfully requesting that the Court impose sanctions under Fed.R.Civ.P. 11, the court's inherent authority, and other remedies under Fed.R.Civ.P. 5 for Handshoe's repeated intentional failure to serve Dr. Leary with pleadings as required. Mr. Handshoe has long been on notice that Leary will seek remedy under Rule 11 for such conduct. Dr. Leary has never received Mr. Handshoe's defense and this is now a pattern. In the alternative, Dr. Leary seeks additional time to file any documents responsive to the defense once it is properly served.

Dr. Leary knows a defense was filed because he received mail from the Court.

A supporting memorandum accompanies this motion.

RESPECTFULLY SUBMITTED, this the 30 day of November, 2018.



CHARLES LEARY, DEFENDANT
appearing *pro se*

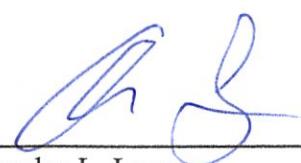
308 5th Ave E
Vancouver, BC V5T 1H4
Canada

802-440-0213
foodvacation@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that, on Nov 30, 2018, I caused a true and correct copy of the above and foregoing to be filed utilizing the Court's CM/ECF electronic document filing system, which caused notice of such filing to be delivered to all counsel of record and parties requesting notice, and by United States First Class Mail, postage prepaid, to the following non-ECF participants having appeared in this action:

[none]



Charles L. Leary